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Attorney for Defendant

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

BAY AREA PAINTERS AND TAPERS  
PENSION TRUST FUND, et al.,

Plaintiffs,  
v.

NEW WEST PARTITIONS, a California  
Corporation,

Defendant.

Case No.: C14-04981 JSW

**JOINT REQUEST TO CONTINUE  
CASE MANAGEMENT CONFERENCE;  
~~PROPOSED~~ ORDER THEREON**

Date: February 20, 2015  
Time: 11:00 a.m.  
Dept.: Courtroom 5, 2<sup>nd</sup> Floor,  
Oakland, CA  
Judge: Honorable Jeffrey S. White

Plaintiffs and Defendant, by and through their respective counsel of record, hereby respectfully request that the Case Management Conference, currently scheduled for February 25, 2015, be continued for approximately sixty (60) days, or as soon thereafter as may be convenient for the Court. Good cause exists for the requested continuance as follows:

1. As the Court's records will reflect, this action was filed by Plaintiffs on November 10, 2014 to compel Defendant's compliance with its obligations to pay monthly contributions to Plaintiffs for hours worked by its employees, pursuant to its Collective Bargaining Agreement.

2. Defendants filed an Answer to the Complaint on December 22, 2014.

3. Counsel for both parties have been in communication throughout this matter and have made progress towards resolution of the matter. Defendant has paid a small portion of the amounts due to Plaintiffs and proposed a schedule for payment of the remaining amounts owed to Plaintiffs.

4. The parties jointly request a continuance of the Case Management Conference to allow the parties to resolve this matter without the need for further litigation.

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5. There are no issues that need to be addressed by the parties at the currently scheduled Case Management Conference. In the interest of conserving costs, as well as the Court's time and resources, Plaintiffs and Defendant jointly and respectfully request that the Case Management Conference, currently scheduled for February 20, 2015, be continued for approximately sixty (60) days, to allow sufficient time for the parties to continue their attempts to resolve this matter outside of litigation.

Date: February 10, 2015

SALTZMAN & JOHNSON  
LAW CORPORATION

By: \_\_\_\_\_/S/\_\_\_\_\_  
Michele R. Stafford  
Attorney for Plaintiffs

Date: February 10, 2015

HIROSHIMA, LEWIS & DAGGETT

By: \_\_\_\_\_/S/\_\_\_\_\_  
Phil Hiroshima  
Attorney for Defendant

**IT IS SO ORDERED.**

Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case Management Conference is hereby continued to April 24, 2015 at 11:00 a.m.. All related deadlines are extended accordingly. The parties' joint case management statement shall be due by April 17, 2015.

Date: February 11, 2015

  
UNITED STATES DISTRICT JUDGE